

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JENNIFER RODRIGUEZ, individually
and as the natural Mother and lawful
guardian of PATRICK ALFORD, JR.,
An infant minor,

CV-10-4661 (JG) (SMG)

Plaintiff,

NOTICE OF MOTION

-against-

CITY OF NEW YORK
NATALIA ROSADO, individually and in
Her capacity as a Child Protective
Specialist for Administration for
Children's Services
ROBERT SALEMI, individually and in
his capacity as a Supervisor of
Child Protective Specialists for
Administration for Children's Services
ST. VINCENT'S SERVICES INCORPORATED
CARLENE ANDERSON, individually and in
her capacity as a Case Worker for
Defendant St. Vincent's Services,
Incorporated
ZOILA VILLALTA, individually and in her
capacity as a supervisor of case
workers for Defendant St. Vincent's
Services, Incorporated,
LIBRADA MORAN,

Defendants.

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C O U N S E L O R S :

PLEASE TAKE NOTICE, that upon the pleadings, annexed
Memorandum of Law, dated September 12, 2011, and the
Declaration of Charles E. O'Bryan, Esq., with exhibits,
dated September 12, 2011, defendants, ST. VINCENT'S
SERVICES, INC. s/h/a ST. VINCENT'S SERVICES, INCORPORATED,
CARLENE ANDERSON, and ZOILA VILLALTA (collectively referred

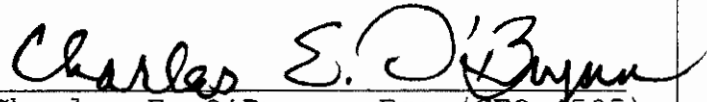
to as ("ST. VINCENT'S"), by their attorneys Jones Hirsch Connors & Bull P.C., on October 14, 2011 will move this Court before the Honorable John Gleeson at the United States District Court for the Eastern District of New York, at 225 Cadman Plaza East, Brooklyn, New York in Courtroom 6C South at 11:30 a.m. for an Order granting ST. VINCENT's motion to dismiss the Complaint, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, on the grounds that this Court lacks subject matter jurisdiction regarding this action as to these defendants, that the plaintiff has failed to state a cause of action for relief, and for such other and further relief as this Court may deem just, proper, and equitable.

PLEASE TAKE FURTHER NOTICE, pursuant to the Court's individual practices, answering papers shall be served and filed by September 28, 2011.

Dated: New York, New York
September 12, 2011

JONES HIRSCH CONNORS & BULL P.C.

By:


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